

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

Crystal Manning As Next Friend of	§	
L.D., a Minor, Mariahlee Mansaw As	§	
Next Friend of P.M., a Minor, Melissa	§	
Hollins As Next Friend of D.H., a Minor, As	§	
Wrongful Death Beneficiaries of Billie	§	
Davis, Deceased, and Ruby Lee Davis,	§	
Individually and as Representative of The	§	
Estate of Billie Davis, Deceased,	§	
	§	
Plaintiffs,	§	
	§	
vs.	§	Case No. 4:23-cv-01115
	§	
LASALLE CORRECTIONS LLC d/b/a	§	
LASALLE CORRECTIONAL CENTER,	§	
HARRIS COUNTY, and HARRIS	§	
COUNTY SHERIFFS OFFICE,	§	
	§	
Defendants.	§	

**CERTIFICATE OF SERVICE**

The undersigned attorney of record for LaSalle Correctional Center, L.L.C. certifies that on November 4, 2024, Defendant served the following discovery responses:

1. Defendant LaSalle Correctional Center, L.L.C.'s Objections and Responses to Plaintiffs' First Requests for Production.

The undersigned also sent correspondence to Plaintiffs' counsel on November 4, 2024 objecting to the jurisdictional discovery directed to Southwestern Correctional, LLC because it has not appeared yet in this matter and because it is a Texas company that has not asserted any challenge to personal jurisdiction. The undersigned sent correspondence to Plaintiffs' counsel on November 8, 2024 objecting to the jurisdictional discovery directed to LaSalle Management Company, LLC because it also has not appeared yet in this matter.

Respectfully submitted,

**HORNE ROTA MOOS, LLP**

By: /s/ Marvin C. Moos

MARVIN C. MOOS

State Bar No.: 14413900

JOSHUA ANDERSON

State Bar No.: 24027198

2777 Allen Parkway, Suite 1200

Houston, Texas 77019

(713) 333-4500

(713) 333-4600 - Facsimile

[mmoos@hrmlawyers.com](mailto:mmoos@hrmlawyers.com)

ATTORNEY-IN-CHARGE FOR  
DEFENDANT LASALLE  
CORRECTIONAL CENTER, L.L.C.

**CERTIFICATE OF SERVICE**

I hereby certify that on **November 8, 2024**, I electronically served this document on all the following counsel:

**Jason C. Webster**  
**Heidi O. Vicknair**  
**Clayton S. Quinn**  
WEBSTER VICKNAIR MACLEOD  
6200 Savoy Drive, Suite 150  
Houston, Texas 77036  
[filing@thewebsterlawfirm.com](mailto:filing@thewebsterlawfirm.com)  
*Attorneys for Plaintiffs*

**Jason M. Byrd**  
The Byrd Law Firm  
448 Orleans Street  
Beaumont, Texas 77701  
[jason@txbyrd.com](mailto:jason@txbyrd.com)  
*Attorneys for Plaintiffs*

**Gregory Burnett**  
HARRIS COUNTY ATTORNEY'S OFFICE  
1019 Congress Street  
Houston, Texas 77002  
[Gregory.Burnett@Harriscountytx.Gov](mailto:Gregory.Burnett@Harriscountytx.Gov)  
*Attorneys for Harris County*

/s/ Marvin C. Moos

MARVIN C. MOOS